

EXHIBIT 'D'

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1 hook up the hose to their tank, we would hook up to our
2 tank, we either had a pump or air blow-off type system.

3 Q. So the fresh acid went into their tank?

4 A. Correct.

5 Q. What happened next?

6 A. Then that tanker would be dropped off, be
7 refilled and we hooked up to the tank that was
8 previously put there.

9 Q. How many times did you pull waste out of
10 that Bostik facility?

11 A. Two or three.

12 Q. And where did that waste go for disposal?

13 A. That also went to Boarhead.

14 Q. Is there any particular location at the
15 Boarhead site where you recall disposing of that Bostik
16 waste?

17 A. No, I don't.

18 Q. How do you know what kind of waste it was?

19 A. Well, because it was in an iron tanker in
20 the building and also had the sulphuric nitric.

21 MR. LEMON: Could you read back that
22 response again?

23 (DESIGNATED ANSWER WAS READ)

24 BY MR. HARRIS:

25 Q. What kind of material were you delivering to

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1 Q. That's why we're trying to get your best

2 recollection, so we remember which is which. Okay. Is
3 there another company that you remember picking up from
4 that was in that general --

5 A. Either Plymouth Tube or Handy & Harmon, I
6 might have them crossed. See, I might think Handy &
7 Harmon might be south on 611 near Plymouth Meeting, or
8 that's Plymouth Tube and Handy & Harman is on the other
9 side. I really forget.

10 Q. Did you pick up waste at both of those
11 places?

12 A. Yes.

13 Q. Let me show you a document that's been
14 previously marked P-42, it's a DeRewal Chemical invoice
15 to Handy & Harmon.

16 A. Uh-huh.

17 Q. Look at the address on that invoice. Now,
18 having looked at that address, do you remember which
19 facility is Plymouth Tube and which facility is Handy &
20 Harmon?

21 A. Yeah, Handy & Harmon is I believe what I
22 said the first time, outside of Norristown. I mean, it
23 could be a Norristown address but I...

24 Q. Let's forget for a second about what the
25 name of the facility was, let's just pick whichever one

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1 that facility?

2 A. Same material.

3 Q. Did you ever pick up any waste from a Betts
4 Labs facility?

5 A. I can't remember.

6 Q. Did you ever pick up any waste from a
7 facility in Ivyland, Pennsylvania?

8 A. I can't remember that also.

9 Q. Did you ever pick up any waste from an
10 Ansley facility?

11 A. That doesn't ring a bell.

12 Q. Did you ever pick up any waste from a Handy
13 & Harman facility?

14 A. Yes.

15 Q. Where was that facility located?

16 A. I believe that is, it's south of -- I know
17 it's outside of Norristown, I don't know what street
18 that would be on.

19 Q. If you look at a map can you remember how
20 you got there?

21 A. No.

22 Q. Not really?

23 A. No, it's been a long time.

24 Q. Yeah, I understand.

25 A. See, I might have two companies --

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1 you want first and tell us what it looked like.

2 MS. FLAX: Objection to the form of the
3 question.

4 BY MR. HARRIS:

5 Q. The one that we're talking about now that
6 might be outside of Norristown.

7 A. Okay.

8 Q. Describe that facility for us.

9 A. Big white building, block. We used to have
10 to go through a gate and that was also bulk pick-up.

11 Q. A bulk pick-up?

12 A. Yeah.

13 Q. How tall was the building?

14 A. One story.

15 Q. Okay.

16 A. It could be 30,000 to 40,000 square foot.

17 Q. What did the entryway look like where you
18 had to get into the facility?

19 A. It was a blacktop entrance with a fence
20 going around it.

21 Q. Okay. And did you have to check in at the
22 gate?

23 A. No.

24 Q. Did you have to go through a gate?

25 A. Yes.

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1 Q. Tell me what happened after you drove
2 through the gate.
3 A. Went in through the gate, and I believe it
4 was a tight fit. I forget what was on either side but
5 I remember a tight fit backing down to get loaded.
6 There again, somebody would come out, put the hose in
7 until it was full.
8 Q. All right. Did anybody tell you there what
9 it was that was being loaded?
10 A. No, I have no idea.
11 Q. Did you see the stuff?
12 A. No, I did not.
13 Q. How many times did you go to that facility
14 to pick up waste?
15 A. I can't remember.
16 Q. At least once?
17 A. At least once.
18 Q. Where did that waste go that you picked up
19 for disposal?
20 A. That would have went to Boarhead.
21 Q. Do you have a recollection of where at
22 Boarhead that particular waste was disposed of?
23 A. No, I don't.
24 Q. And how was that disposed at Boarhead,
25 physically?

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1 A. I don't know. I mean, if anything it was
2 put into a hole that was pre-dug or --
3 Q. Okay.
4 A. Depending on who unloaded it.
5 Q. Did you ever pick up any waste from a
6 facility called Quickline?
7 A. Yes.
8 Q. Where was the Quickline facility located?
9 A. Over by Cherry Hill, New Jersey.
10 Q. Where in Cherry Hill was it located?
11 A. I used to go over the Tacony bridge, take
12 that all the way out, maybe 10 or 15 miles. It was an
13 industrial park off to the right or left.
14 Q. It was in an industrial park?
15 A. Right. I believe it was Cherry Hill area.
16 Q. What did the facility look like?
17 A. That was a block or a brick. I think there
18 were several different companies, good-sized building.
19 Q. Okay. Did you ever go inside the Quickline
20 building?
21 A. Uh-huh.
22 Q. What was going on inside?
23 A. That was also an etching, they did etching.
24 Q. How many times were you at Quickline?
25 A. There again, we probably picked up maybe

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1 once a month.
2 Q. How about you yourself?
3 A. Myself? Several times.
4 Q. Is several more than ten?
5 MS. QUINN: Objection.
6 MR. HARRIS: I don't want you to guess,
7 if you have a range.
8 THE WITNESS: A range? I would say four
9 to eight.
10 BY MR. HARRIS:
11 Q. And what kind of waste was it?
12 A. They were packed, they had fiber packs, the
13 15 or 20 gallons and also 55-gallon drums.
14 Q. Is fiber packed the cardboard thing?
15 A. That's correct, with the poly liner.
16 Q. And 55-gallon drums?
17 A. That's correct.
18 Q. Did you pick up both types of packaging each
19 time you went?
20 A. That's correct.
21 Q. What kind of truck did you use to make that
22 pick-up?
23 A. That would have been a straight truck.
24 Q. What was the quantity of material that you
25 picked up each time?

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1 A. It varied. It could have been six, ten
2 55-gallon drums, a couple of the 15 gallons,
3 20 gallons.
4 Q. That would have been an average load?
5 A. Average. There again, sometimes we would
6 have two or three people in the same day.
7 MS. QUINN: Can you read that back?
8 (DESIGNATED ANSWER WAS READ)
9 THE WITNESS: We would pick up from two
10 or three people.
11 BY MR. HARRIS:
12 Q. On the same truck?
13 A. Right, in the same truck.
14 Q. What time frame are we talking for these
15 times you went to Quickline?
16 A. That also would have been through '75, '76.
17 Q. Where did you take that waste for disposal
18 when you picked it up from Quickline?
19 A. That majority of the time that, that I
20 picked it up it probably went back to Boarhead Farms.
21 Q. Well, you said "probably". We don't want
22 you guessing. Do you remember taking it back there?
23 A. Well, I know some of it went back, some of
24 it would have gone to the city.
25 Q. Which location at the city do you remember

32 (Pages 122 to 125)